

**UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE: : CHAPTER 13
MARIANNE MEHALSHICK :
(Debtor) :
: Case No. 18-13758

MOTION TO CONVERT CASE TO CHAPTER 7

AND NOW comes the Debtor, MARIANNE MEHALSHICK, by and through who are undersigned Counsel, and hereby respectfully move this Court as follows:

1. The Debtor initiated this Bankruptcy proceeding pursuant to Chapter 13 of the Bankruptcy Code.
2. The Debtor initiated these proceedings to save her residence; however, since the original filing the residence has been lost to the secured lender; the Debtor is unable to support the Chapter 13 Plan.
3. The Debtor has decided she has no choice but to convert these proceedings to a Chapter 7.

THEREFORE, Debtor prays for an Order Converting this proceeding to a Chapter 7 proceeding, and for such other relief as is just equitable.

Respectfully submitted,

4-10-19

DATE

BY:



RONALD V. SANTORA, ESQ.
(Attorney for Debtor)